

BEFORE THE

Federal Communications Commission

WASHINGTON, D. C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
ATTN: THE SECRETARY

In the Matter of)
)
AMENDMENT OF SECTION 73.202(b),) MM Docket No.
Table of FM Allotments) RM No.
(Eatonville, Wenatchee and Moses Lake, WA))

To: Chief, Allocations Branch

DOCKET FILE COPY ORIGINAL

**PETITION FOR RULEMAKING
AND ORDERS TO SHOW CAUSE**

Barbara J. Geesman ("Geesman"), licensee of Station KKBY-FM, Eatonville, Washington, herein requests that Table of FM Allotments, Section 73.202(b) of the Commission's Rules, be amended to substitute Channel 285C3 for Channel 285A at Eatonville, Washington, and that the license of KKBY-FM be modified to specify operation on the higher class channel. This petition is supported by the attached Engineering Statement prepared by E. Harold Munn, Jr. & Associates, Inc. In support of this request, the following is stated:

1. Geesman seeks to upgrade the allotment for KKBY-FM, Eatonville, Washington, in order to expand the area served by the station and to make a more efficient use of the broadcast spectrum. In order to substitute Channel 285C3 for Channel 285A, a special reference point (NL 46° 50' 19"; WL 112° 11' 53") is proposed. As indicated in Figure 4 of the attached Engineering Statement, operating from those coordinates KKBY-FM would place a city-grade contour over all of Eatonville.

2. In order to accommodate the proposed upgrade of Station KKBY-FM, (a) Channel 262C2 will need to be substituted for Channel 285C2 at Wenatchee, Washington, and the license of Station KKR V, Wenatchee, Washington, be modified accordingly, and (b) Channel 285C1 will need to be substituted for Channel 262C1 at Moses Lake, Washington and the license of KWIQ-FM, Moses Lake, Washington, be modified accordingly. The channel substitutions would not require a change in the transmitter site of either KKR V or KWIQ-FM. Accordingly, Geesman requests that the Notice of Proposed Rule Making to be issued in response to this petition incorporate orders to show cause why the KKR V and KWIQ-FM frequencies should not be changed.

3. Thus, Geesman proposes the FM Table of Allotments be amended as follows:

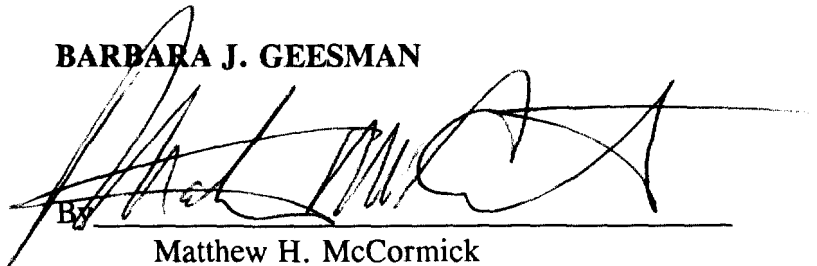
<u>Community</u>	<u>Present Allotment</u>	<u>Proposed Allotment</u>
Eatonville, Washington	285A	285C3
Wenatchee, Washington	271C, 285C2	271C, 262C2
Moses Lake, Washington	257A, 262C1	257A, 285C1

4. This arrangement would result in a preferable allotment scheme in that KKBY-FM would be able to serve a far greater number of persons. At the same time, Stations KKR V and KWIQ-FM would receive equivalent class channels and their ability to serve the public would remain unchanged. As set forth in the attached Engineering Statement, the proposed allotments can be made in compliance with the Commission's spacing requirements.

5. If the FM Table of Allotments is amended as requested, Geesman (a) will pay the reasonable expenses associated with the change in the frequencies of KKRK and KWIQ-FM, (b) promptly will submit an application for a construction permit to implement the upgrade, and (c) upon grant of the construction permit application, promptly will construct the upgraded facilities.

WHEREFORE, in light of the foregoing, Barbara J. Geesman respectfully requests the FM Table of Allotments be amended as set forth above.

BARBARA J. GEESMAN

A handwritten signature in black ink, appearing to read 'Matthew H. McCormick', is written over a horizontal line. The signature is stylized and cursive.

Matthew H. McCormick
Her Counsel

Reddy, Begley & McCormick
2175 K Street, N.W., Suite 350
Washington, D.C. 20037
(202) 659-5700

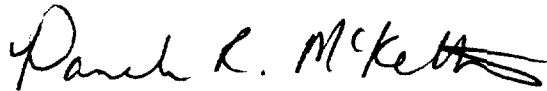
April 3, 1998

CERTIFICATE OF SERVICE

I, Pamela R. McKethan, hereby certify that on this 3rd day of April 1998, copies of the foregoing **PETITION FOR RULEMAKING AND ORDERS TO SHOW CAUSE** was mailed, first-class, postage prepaid, to the following:

Peter A. Casciato, Esquire
Peter A. Casciato, A Professional Corporation
8 California Street, Suite 701
San Francisco, California 94111
Counsel for Pioneer Broadcasting Company, Inc.,
Licensee of Station KKRK(FM), Wenatchee, Washington

KWIK Radio Inc.
Box 999
Moses Lake, WA 98837
Licensee of Station KWIK-FM, Moses Lake, Washington



Pamela R. McKethan

ENGINEERING REPORT

**In Support of a Petition to Upgrade Channel
285A to 285C3 at Eatonville, WA**

**With Substitution of
Channel 262C2 for 285C2 at Wenatchee, WA
Channel 285C1 for 262C1 at Moses Lake, WA**

March 1998

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Broadcast Engineering Consultants
Coldwater, MI 49036

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CERTIFICATION OF ENGINEER

The firm of E. Harold Munn, Jr. & Associates, Inc., Broadcast Engineering Consultants, with offices at 100 Airport Drive, Coldwater, Michigan, has been retained for the purpose of preparing the technical data forming this report.

The report has been prepared by properly trained electronics specialists under the direction of the undersigned whose qualifications are a matter of record before the Federal Communications Commission.

I declare under penalty of perjury that the contents of this report are true and accurate to the best of my knowledge and belief.

March 17, 1998

E. HAROLD MUNN, JR. & ASSOCIATES, INC.

By Wayne S. Reese
Wayne S. Reese, President

100 Airport Drive, P. O. Box 220
Coldwater, Michigan 49036

Telephone: (517) 278-7339

ENGINEERING STATEMENT

In Support of a Petition to Amend §73.202(b)

The firm of E. Harold Munn, Jr. & Associates, Inc. was retained to prepare this Engineering Statement in support of a petition to amend 47 C.F.R. §73.202(b), the FM Table of Allotments.

It is proposed to amend the FM Table of Allotments to upgrade the allocation of KKBV-FM, Eatonville, Washington, on Channel 285 from Class A to Class C3. For the purposes of this study, special reference coordinates are specified at NL 46° 50' 19"; WL 112° 11' 53". The reference point meets all the spacings of §73.207(b)(1). To permit the upgrade of Channel 285(C3) at Eatonville, it is necessary to make two channel substitutions. Channel 262(C2) is proposed to be substituted for Channel 285(C2) at Wenatchee, Washington, presently reserved for Station KKRK. Also, Channel 285(C1) is proposed to be substituted for Channel 262(C1) at Moses Lake, Washington, presently reserved for Station KWIQ-FM. These changes were added to the FM computer database, with an (AL) appended to the station call letters and the city of license shown all in capital letters. The present licensed allocations for these three stations have been deleted from the tabulations.

Figure 1 is a tabulation which demonstrates that, at the reference point proposed and for the class of station proposed, all required separations are fully met for the allotment of Channel 285(C3), 104.9 MHz at Eatonville, Washington.

Figure 2 is a tabulation which demonstrates that, at the present site of KKRK, Wenatchee, WA, all required spacings of §73.207(b)(1) are met for operation on Channel 262(C2), 100.3 MHz.

Figure 3 is a tabulation which demonstrates that, at the present site of KWIQ-FM, Moses Lake, WA, all required spacings of §73.207(b)(1) are met for operation on Channel 285(C1), 104.9 MHz.

Figure 4 is a computer plot of the transmitter open area for Channel 285(C3) at Eatonville, WA. Figure 5 is a plot of the 3.16 mV/m coverage from the C3 reference point coordinates showing that 100% coverage of the Eatonville city limits is achieved.

It is requested that 47 C.F.R. §73.202(b) be amended as follows:

<u>CITY, STATE</u>	<u>PRESENT</u>	<u>PROPOSED</u>
Eatonville, Washington	285A	285C3
Wenatchee, Washington	271C, 285C2	271C, 262C2
Moses Lake, Washington	257A, 262C1	257A, 285C1

FIGURE 1 - Class C3 Upgrade from New Site
KKBY - EATONVILLE WA Special Rf. Pt.

DISPLAY DATES
DATA 03-13-98
SEARCH 03-16-98

Channel 285 - 104.9 MHz

Call N. Lat.	Channel W. Lng.	Location	Power	Dist	Azi HAAT	FCC	Margin
KKBYAL AL 46 50 19	285C3 122 11 53	EATONVILLE CN	WA 25.000 kW	0.00	0.0 100 M	153.0	-153.00
Barbara J. Geesman Alternate							
KDUXFM LI 46 56 00	284C2 123 43 49	Aberdeen C EN	WA 31.000 kW	117.26	275.7 110 M	117.0	0.26
Pioneer Broadcasting Company,							
KCMS.C CP 47 32 40	287C1 122 06 26	Edmonds C CN	WA 50.000 kW	78.77	5.0 393 M	76.0	2.77
Crista Ministries, Inc.							
KDUXFM LI 46 57 27	284C2 123 48 53	Aberdeen C CN	WA 1.000 kW	123.90	276.7 -8 M	117.0	6.90
Pioneer Broadcasting Company,							
*** This record is for an AUXILIARY facility of KDUX-FM, Abdereen, WA. ***							
KKRH.A AP 45 29 21	286C1 122 41 43	Salem C CY	OR 54.000 kW	154.83	194.5 386 M	144.0	10.83
KKSJ, Inc.							
Applicant requests downgrade of station class.							
Amended 960515							
Proposed to Canada as Class C 960516							
KWIQAL AL 47 06 09	285C1 119 14 26	MOSES LAKE CN	WA 100.000 kW	226.97	81.5 59 M	211.0	15.97
KWIQ Radio, Inc. (Alternate)							
AD282 AD 46 38 57	282A 122 57 58	Chehalis C	WA 0.000 kW	62.36	250.5 0 M	42.0	20.36
C.C. Broadcasting Company							
Proposed as Class B1 to Canada 970108-Limited to 6kw ERP and 100m HAAT or							
the equivalent-Accepted by Canada 970429							
Site Restriction 1.4km South							
DE285 DE 49 03 09	285B 122 14 53	Abbotsford A N	BC 0.000 kW	246.14	359.2 0 M	223.0	23.14
960509							
Proposed by Canada 960213-Accepted by Commission 960506							
CFSRFM OP 49 03 09	285B 122 14 53	Abbotsford ADHN	BC 50.000 kW	246.14	359.2 151 M	223.0	23.14
921004							
AD285 AD 49 21 12	285C 122 57 18	Vancouver A N	BC 0.000 kW	285.19	348.9 0 M	259.0	26.19
960509							
Proposed by Canada 960213-Accepted by Commission 960506-Specially negotiat							
short-spaced allotment.							
KKRH LI 45 00 28	286C 122 20 05	Salem CN	OR 100.000 kW	203.77	183.0 561 M	176.0	27.77
KKSJ, Inc.							
KCMS LI 47 46 06	287C1 122 21 07	Edmonds C CN	WA 115.000 kW	104.02	353.7 220 M	76.0	28.02
Crista Ministries, Inc.							
Grandfathered at 115 kW ERP and 220 meters HAAT							
ERP exceeds the maximum value allowed under International agreements							

E. Harold Munn Jr. & Associates Inc.
P.O. Box 220 - Coldwater MI 49036

FIGURE 2 - Alternate Channel for
KKRV - Wenatchee WA

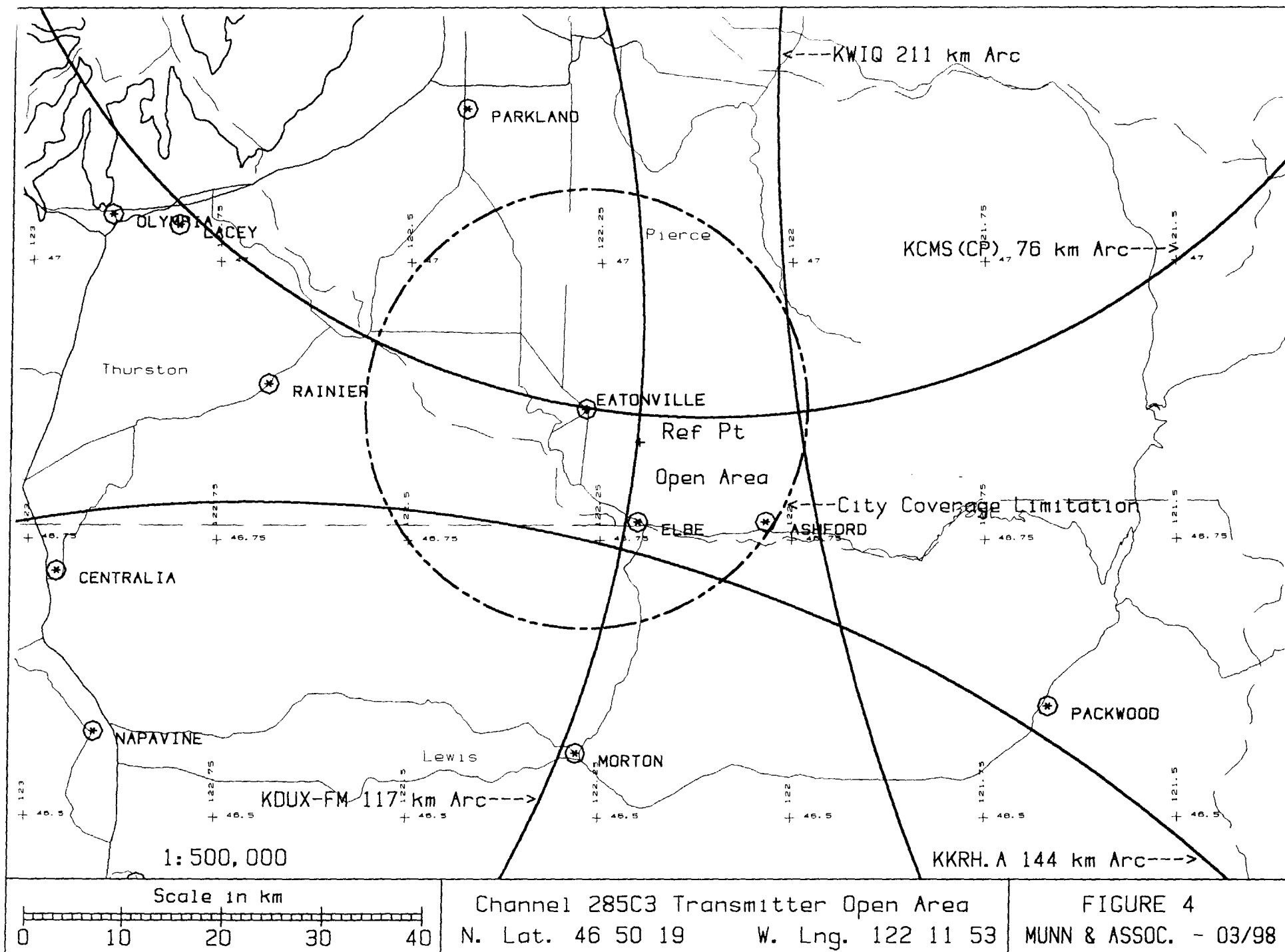
REFERENCE		CLASS = C2	DISPLAY DATES
47 28 44 N			DATA 03-13-98
120 12 49 W		Current Spacings	SEARCH 03-16-98
----- Channel 262 - 100.3 MHz -----			

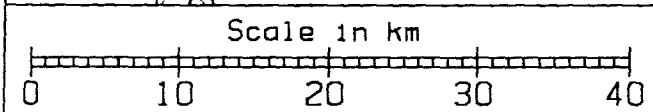
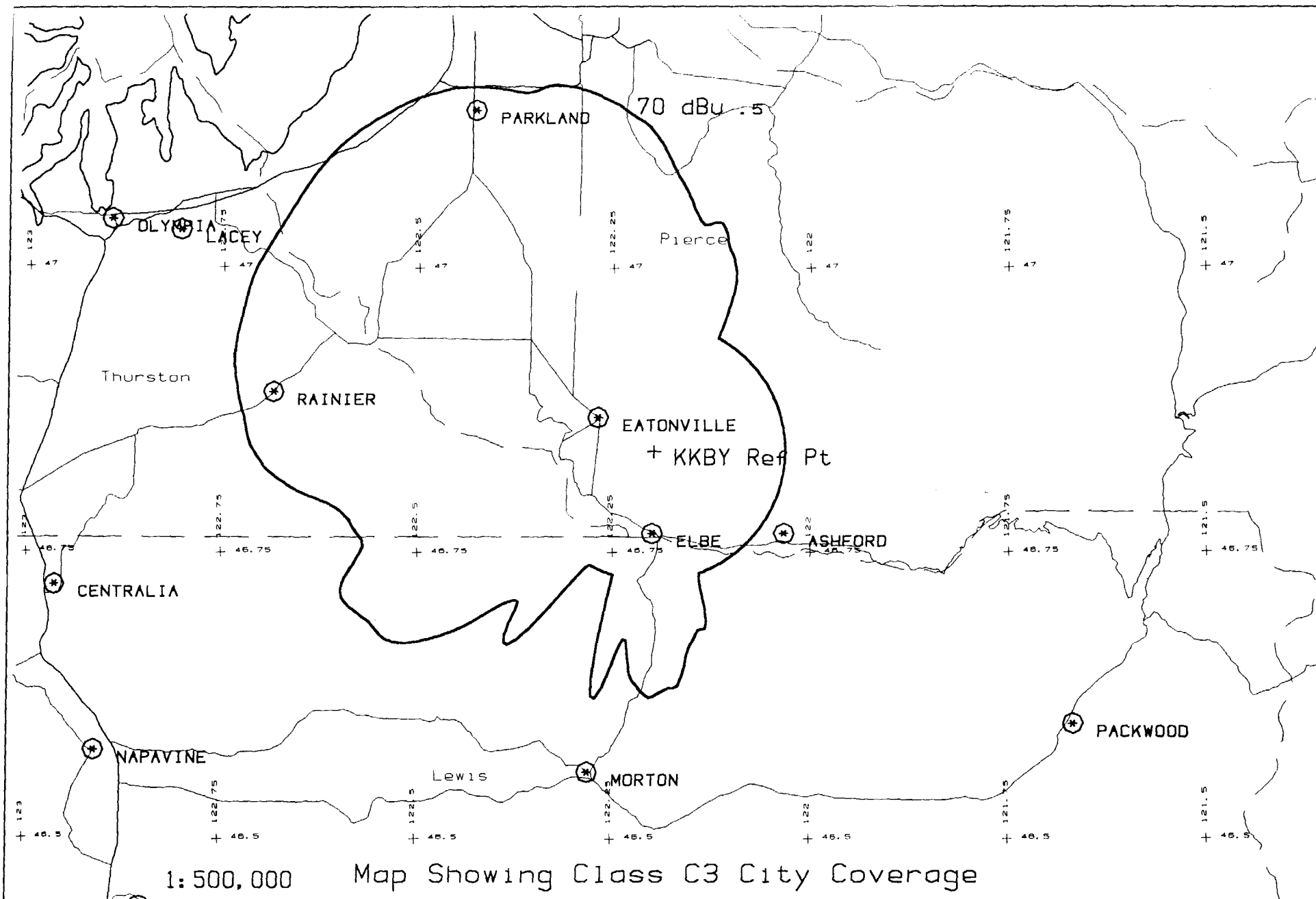
Call	Channel	Location	Power	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.				HAAT		
KKRVAL AL	262C2	WENATCHEE	WA	0.00	0.0	190.0	-190.00
47 28 44	120 12 49	CN	6.100 kW		403 M		
Infinity Systems, Inc. (Alter						980305	
AO262 AL	262C	Victoria	BC	277.54	297.8	274.0	3.54
48 35 41	123 32 37	AD	0.000 kW		0 M		
						950505	
SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION-ACCEPTED BY COMMISSION							950405
AL262 AL	262C	Victoria	BC	277.54	297.8	274.0	3.54
48 35 41	123 32 37	A	0.000 kW		0 M		
						950505	
Accepted by Commission 950405-Specially negotiated, short-spaced assignmen							
KIROFM LI	264C	Seattle	WA	132.74	271.9	105.0	27.74
47 30 14	121 58 29	CDEY	58.000 kW		714 M		
Bonnevillie Holding Company						BLH970311KA	971009
Proposed to Canada 950519-Specially Negotiated Short-Spaced Assignment							
Limited to 84kw ERP and 600m HAAT or the Equivalent along 34.4 deg azimuth							
towards channel 264C in Penticton, BC.-Accepted by Canada 950718							
KISW LI	260C	Seattle	WA	142.87	273.6	105.0	37.87
47 32 41	122 06 28	C CN	5.000 kW		335 M		
Nationwide Communications, In						BLH960717KC	961119
For Auxiliary Purposes Only							
KISW LI	260C	Seattle	WA	142.87	273.6	105.0	37.87
47 32 41	122 06 28	C CN	100.000 kW		350 M		
Nationwide Communications, In						BLH850916KK	960930
SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION							
KKRZ LI	262C	Portland	OR	291.97	222.7	249.0	42.97
45 31 22	122 45 07	C CY	100.000 kW		437 M		
Taft Television and Radio Co.						BLH870206KB	961218

E. Harold Munn Jr. & Associates Inc.
P.O. Box 220 - Coldwater MI 49036

FIGURE 3 - Alternate Channel for
KWIQ - Moses Lake WA

REFERENCE	CLASS = C1	DISPLAY DATES				
47 06 09 N	Current Spacings	DATA 03-13-98				
119 14 26 W		SEARCH 03-16-98				
----- Channel 285 - 104.9 MHz -----						
Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Power	HAAT			
KWIQAL AL	285C1	MOSES LAKE WA	0.00	0.0	245.0	-245.00
47 06 09	119 14 26	CN 100.000 kW	59 M			
KWIQ Radio, Inc. (Alternate)				980305		
KMJYFM LI	285A	Newport WA	203.54	53.8	200.0	3.54
48 09 37	117 01 49	C CN 6.000 kW	-12 M			
James and Helen Stargel				BLH930823KG	931209	
Specially-negotiated channel ltd. 6.9 kw ERP at 100m HAAT towards Bonningt						
Falls, BC on channel 285A (azimuth 347 degrees true north)-Accepted by						
Canada 921013						
KONAFM LI	287C	Kennewick WA	111.78	178.1	105.0	6.78
46 05 51	119 11 30	CN 100.000 kW	347 M			
Tri-Cities Communications, In				BLH940525KA	940914	
KONAFM LI	287C	Kennewick WA	111.78	178.1	105.0	6.78
46 05 51	119 11 30	CN 10.000 kW	301 M			
Tri-Cities Communications, In				BLH940812KZ	950612	
KKBYAL AL	285C3	EATONVILLE WA	226.97	263.6	211.0	15.97
46 50 19	122 11 53	CN 25.000 kW	100 M			
Barbara J. Geesman Alternate						
KEEH LI	284A	Spokane WA	156.17	69.4	133.0	23.17
47 34 45	117 17 48	C CN 0.320 kW	420 M			
Sunbrook Communications Corpo				BLH930629KB	940106	
Proposed as B1 to Canada on 920306-Accepted by Canada 920602-Specially						
negotiated short spaced allotment.						
AL286 AL	286B	Osoyoos BC	223.49	353.7	195.0	28.49
49 06 00	119 34 45	A 0.000 kW	0 M			
				921004		
KCMB LI	284C	Baker OR	247.22	152.4	209.0	38.22
45 07 26	117 46 48	CN 100.000 kW	532 M			
Clare Marie Ferguson				BLH880719KB	960820	
CFSRFM OP	285B	Abbotsford BC	311.76	315.3	271.0	40.76
49 03 09	122 14 53	ADHN 50.000 kW	151 M			
				921004		
DE285 DE	285B	Abbotsford BC	311.76	315.3	271.0	40.76
49 03 09	122 14 53	A N 0.000 kW	0 M			
				960509		
Proposed by Canada 960213-Accepted by Commission 960506						
AP286 AP	286A	Lewiston ID	182.76	112.3	133.0	49.76
46 27 33	117 02 18	C CN 0.500 kW	335 M			
Robert W. Prasil, Jr. & Melva				BPH931222MA	980306	





KKBY 285C3 25kW 100M HAAT
 N. Lat. 46 50 19 W. Lng. 122 11 53

FIGURE 5
 MUNN & ASSOC. - 03/98